

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TRUSTEES OF THE CEMENT MASONS )  
PENSION FUND, LOCAL 502; TRUSTEES )  
OF THE CEMENT MASONS INSTITUTE OF )  
CHICAGO, ILLINOIS; TRUSTEES OF THE )  
CEMENT MASONS SAVINGS FUND, LOCAL )  
502; and TRUSTEES OF THE CEMENT MASONS )  
APPRENTICE EDUCATION AND TRAINING )  
FUND, LOCAL 502, )

Plaintiffs )

v. )

NORANNE CONCRETE, INC., )

Defendant. )

No. 08 C 2190

Judge Lefkow

Magistrate Judge Nolan

**NOTICE OF MOTION**

**TO:** NORANNE CONCRETE, INC.  
C/O ITS REGISTERED AGENT,  
ANTHONY L. JURGETO  
13657 SOUTHWEST HIGHWAY  
ORLAND PARK, IL 60462

NORANNE CONCRETE, INC.  
C/O ITS REGISTERED AGENT,  
ANTHONY L. JURGETO  
427 JANE CT.  
LEMONT, IL 60439

**PLEASE TAKE NOTICE** that on **June 26, 2008**, at **9:30 a.m.** or as soon hereafter as Counsel may be heard, I shall appear before the **Honorable Judge Lefkow, Room 1925** in the Courtroom usually occupied by him in the Federal District Court, 219 S. Dearborn Street, Chicago, Illinois, and then and there move and present the attached Motion for Order of Default and Judgment In Sum Certain.

**TRUSTEES OF THE CEMENT MASONS  
PENSION FUND, LOCAL 502, et. al.**

s/ Donald D. Schwartz  
One of their Attorneys

Donald D. Schwartz  
**ARNOLD AND KADJAN**  
19 West Jackson Boulevard  
Chicago, IL 60604  
(312) 236-0415

**PROOF OF SERVICE**

I hereby certify that I electronically filed this Notice of Motion and Motion for Order of Default and Judgment in Sum Certain with the Clerk of the Court and a copy will be sent to the above-mentioned at the above-mentioned address and depositing the same, in the U.S. Mail at Jackson & Dearborn, Chicago, Illinois on the 18<sup>th</sup> day of June 2008, at or before the hour of 5:00 p.m.

NORANNE CONCRETE, INC.  
C/O ITS REGISTERED AGENT,  
ANTHONY L. JURGETO  
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s/Donald D. Schwartz  
**ARNOLD AND KADJAN**  
19 W. Jackson Blvd., Suite 300  
Chicago, IL 60604  
312-236-0415 (phone)  
312-341-0438 (fax)  
Dated: June 18, 2008